

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

PETER M. GALLIGAN,

Plaintiff,

v.

ADTALEM GLOBAL EDUCATION  
INC. f/k/a DEVRY EDUCATION  
GROUP; ADTALEM GLOBAL  
HEALTH, INC. f/k/a DEVRY MEDICAL  
INTERNATIONAL, INC.; ROSS  
UNIVERSITY SCHOOL OF MEDICINE  
SCHOOL OF VETERINARY  
MEDICINE (ST. KITTS) LIMITED;  
AND DOES 1 THROUGH 50,

Defendants.

Case No. 1:17-cv-06310

Hon. Joan H. Lefkow

**DEFENDANT'S MOTION TO DISMISS**  
**PLAINTIFF'S REMAINING CLAIM IN THE THIRD AMENDED COMPLAINT**

For the reasons stated in its Brief Regarding Jurisdiction pursuant to the Court's February 5, 2020 ordering simultaneous briefs regarding jurisdiction (see ECF No. 83), Defendant Ross University School of Medicine School of Veterinary Medicine (St. Kitts) Limited ("Ross" or "Defendant")<sup>1</sup> hereby moves to dismiss the remaining breach of contract claim in Plaintiff's Third Amended Complaint based on *forum non conveniens* grounds. Plaintiff's sole remaining claim should be dismissed with prejudice to re-filing in any other United States court, but without prejudice to Plaintiff refile his remaining common law claim in St. Kitts.

---

<sup>1</sup> On January 15, 2020, the Court dismissed all other defendants from the lawsuit. (ECF No. 76.)

**DATED: February 19, 2020**

Respectfully submitted,

ADTALEM GLOBAL EDUCATION INC.  
f/k/a DEVRY EDUCATION GROUP;  
ADTALEM GLOBAL HEALTH, INC.  
f/k/a DEVRY MEDICAL  
INTERNATIONAL, INC.; ROSS  
UNIVERSITY SCHOOL OF MEDICINE  
SCHOOL OF VETERINARY  
MEDICINE (ST. KITTS) LIMITED

By: s/Megan Troy

Brian Stolzenbach  
[bstolzenbach@seyfarth.com](mailto:bstolzenbach@seyfarth.com)  
Megan E. Troy  
[mtroy@seyfarth.com](mailto:mtroy@seyfarth.com)  
Andrew R. Cockroft  
[acockroft@seyfart.com](mailto:acockroft@seyfart.com)  
SEYFARTH SHAW LLP  
233 S. Wacker Drive, Suite 8000  
Chicago, IL 60606  
Telephone: (312) 460-5000  
Facsimile: (312) 460-7000

**CERTIFICATE OF SERVICE**

I do hereby certify that I have caused a true and correct copy of the foregoing by filing a copy with the Court's CM/ECF system, which will send notification to the following, on this 19th day of February, 2020:

Emil Bayko  
Prebeg Faucett & Abbott, PLLC, Suite 307  
8441 Gulf Freeway  
Houston, TX 77017  
Email: tbayko@pfalawfirm.com

Michael W. Ford  
Law Office of Michael W Ford  
4 Timberwood Ln  
Riverwoods, IL 60015-2400  
Email: mfordski@gmail.com

s/Megan Troy